

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
Case Number 24-cv-21050-CMA**

PRESIDENT DONALD J. TRUMP, an  
individual,

Plaintiff,

v.

AMERICAN BROADCASTING COMPANIES,  
INC., a Delaware corporation, ABC NEWS,  
INC., a Delaware corporation, and GEORGE  
STEPHANOPOULOS, an individual,

Defendants.

**DECLARATION OF NATHAN SIEGEL IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS COMPLAINT**

I, Nathan Siegel, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at the law firm of Davis Wright Tremaine LLP, counsel for Defendants American Broadcasting Companies, ABC News, Inc., and George Stephanopoulos (“Defendants”) in the above-captioned matter.

2. I submit this declaration to annex documents relevant to Defendants’ Motion to Dismiss Plaintiff Donald J. Trump’s Complaint in this action.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the jury verdict in *Carroll v. Trump*, 22-cv-10016-LAK (S.D.N.Y.) determining that Plaintiff “sexually abused” E. Jean Carroll that Plaintiff cites at Compl. ¶ 28.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the defamation counterclaims filed by Plaintiff Trump on June 27, 2023 against Carroll in *Carroll v. Trump*, No. 20-CV-7311 (LAK) (S.D.N.Y.).

5. Attached hereto as **Exhibit 3** is a true and correct video copy of the March 10, 2024 interview in suit of Representative Nancy Mace on *This Week with George Stephanopoulos* in suit that was aired by ABC News (the “Segment”) and is available at <https://abcnews.go.com/ThisWeek/video/voters-moved-jan-6-rep-nancy-mace-107976891>.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the July 19, 2023 *Washington Post* article featured in the Segment, headlined *Judge clarifies: Yes, Trump was found to have raped E. Jean Carroll* authored by Aaron Blake and available at <https://www.washingtonpost.com/politics/2023/07/19/trump-carroll-judge-rape/>.

7. Attached hereto as **Exhibit 5** are true and correct copies of the briefs filed by Mr. Trump and Ms. Carroll in advance of Judge Kaplan’s July 19, 2023 order denying Plaintiff Trump’s motion for new trial and remittitur in *Carroll v. Trump*, No. 22-CV-10016 (LAK), 2023 WL 4612082 (S.D.N.Y. July 19, 2023).

8. Attached hereto as **Exhibit 6** are true and correct copies of the briefs filed by Ms. Carroll and Mr. Trump in advance of Judge Kaplan’s August 7, 2023 order dismissing Plaintiff Trump’s counterclaims in *Carroll v. Trump*, No. 20-CV-7311 (LAK), 2023 WL 5017230 (S.D.N.Y. Aug. 7, 2023).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 10, 2024.

Respectfully Submitted,

**DAVIS WRIGHT TREMAINE LLP**

/s/ Nathan Siegel

Nathan Siegel (pro hac vice)  
1301 K Street NW, Suite 500  
Washington, DC 20005

Phone: 202-973-4237

Email: [nathansiegel@dwt.com](mailto:nathansiegel@dwt.com)

*Counsel for Defendants*